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July 25, 2022

VIA ECF

Honorable Sidney H. Stein
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Victor Rivera, Case No. 21-CR-221 (SHS)

Dear Judge Stein:

This firm represents defendant Victor Rivera in the referenced matter. On May 23, 2022 this Court sentenced Mr. Rivera principally to a 27-month term of imprisonment. He is scheduled to self-surrender to the federal prison camp at USP Canaan on Monday, August 15, 2022. Before surrendering, Mr. Rivera wishes to visit with his sister in Fort Lauderdale, FL. Specifically, Mr. Rivera seeks to fly to Miami, FL on Thursday, July 29, 2022 and to fly back to New York on Monday, August 1, 2022. Miami, FL is approximately 25 miles from Fort Lauderdale, FL – His sister will pick him up at the Miami, FL airport and return him to that airport.

Mr. Rivera has fully complied with all of the terms of his pre-trial release and attended all appearances required by this Court. I have spoken with AUSA Tara LaMorte, who has no objection to Mr. Rivera's proposed travel. I have also spoken with U.S. Pre-Trial Services Officer Vincent Adams, who takes no position on Mr. Rivera's proposed travel.

Accordingly, we respectfully request that this Court enter an Order modifying the terms of Mr. Rivera's pre-trial release so that he may travel to Fort Lauderdale, FL from July 29, 2022 to August 1, 2022.

Thank you for your consideration and attention to this matter.

Respectfully submitted,

/s/

Harlan Protass

cc: Tara LaMorte, Esq. (via ECF)
David Abramovicz, Esq. (via ECF)
Assistant United States Attorneys

Vincent Adams (via e-mail)
U.S. Probation Officer